

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ABN AMRO MORTGAGE GROUP, INC.,

Plaintiff,

- against -

NATIONAL SETTLEMENT AGENCY, INC.,
STEVEN M. LEFF, RACHEL M. LEFF AND
RICHARD A. LEFF,

Defendants.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: OCT 01 2007

Case No. 07-CIV-7657 (LTS)

**SPECIFIC DISCLOSURE
ORDER PURSUANT TO PRIOR
DISCLOSURE ORDERS
AS AGAINST DEFENDANTS
STEVEN M. LEFF AND
NATIONAL SETTLEMENT
AGENCY, INC.**

Upon the Order to Show Cause of Plaintiff ABN AMRO Mortgage Group Inc. ("AAMG") dated September 24, 2007, the Declaration of Thomas J. Kavalier dated September 21, 2007, the Further Declaration of Thomas J. Kavalier dated September 23, 2007 (the "Second Declaration"), the Memorandum of Law in support of said Order to Show Cause dated September 21, 2007 and the Second Memorandum of Law in support of said Order to Show Cause dated and the September 23, 2007, and due deliberation being had thereon;

And Plaintiff having filed an Amended Complaint on September 14, 2007;

And the Court having previously, pursuant to its Order of September 10, 2007 (the "September 10 Order"), determined that, pursuant to Fed. R. Civ. P. 64 and C.P.L.R. §§ 6201(3) and 6212: (a) plaintiff has causes of action whereby it has demanded and would be entitled to a money judgment against the named defendants in the amount of \$2,261,744.10, plus interest, costs, disbursements, and fees; (b) it is probable that the plaintiff will succeed on the

merits of its claims against Defendants; (c) Defendants, with intent to defraud the plaintiff or frustrate the enforcement of a judgment that might be rendered in the plaintiff's favor, have assigned, disposed of, and secreted property, and are about to continue such acts; and (d) the amount demanded from Defendants exceeds all counterclaims known to the plaintiff; and having issued the September 10 Order for the foregoing reasons;

And the Court having issued its Supplemental Disclosure Order as of September 28, 2007 (the "September 28 Order", collectively with the September 10 Order, the "Disclosure Orders"),

And Plaintiff AAMG and Defendants Steven M. Leff and Richard A. Leff having appeared before this Court on September 28, 2007; it is hereby


ORDERED that, pursuant to Fed. R. Civ. P. 64 and C.P.L.R. § 6220 and the Disclosure Orders, Defendants Steven M. Leff and NSA on or before 4:00 p.m. on October 4, 2007 must by fax, e-mail or personal delivery, provide counsel to Plaintiff with an affidavit sworn by him, listing every bank account, brokerage account, or other investment account held by Defendant Steven M. Leff or NSA (including all accounts in the name of Steven M. Leff or NSA, held in trust by or for Steven M. Leff or NSA, and any accounts in which Steven M. Leff or NSA has had an interest) in the last two years, including for each such account (1) the institution name; (2) the account number; (2) the title of the account, including whether it is a trust account and each person or entity with an interest in or authority over the account and the nature of that person or entity's interest or authority; (3) the form of account, be it brokerage, checking, savings, money market, escrow, or any other form, and the description or category of the account used to de-

scribe it at the institution at which it is held and (4) the approximate value of the account; and it is further

ORDERED that, pursuant to Fed. R. Civ. P. 64 and C.P.L.R. § 6220 and the Disclosure Orders, Defendants Steven M. Leff and NSA on or before 4:00 p.m. on October 4, 2007 must by fax, e-mail or personal delivery provide counsel to Plaintiff with an affidavit sworn by him, listing every stock or other business or investment interest (including certificates of deposit, bearer bonds, notes, commercial paper or non-negotiable IOUs) held directly or indirectly, personally or in trust by Defendant Steven M. Leff or NSA in the last two years, other than those interests held via the accounts listed in accordance with section (a) of this order; including for each such item (1) the form, location and/or custodial relationship in and by which the interest is held, including but not limited to physical certificate, electronic book entry and (2) a description of the nature of the entity to which the instrument described relates (whether the relationship is one of counterparties to an agreement or an ownership interest), be it an operating company, holding company, unincorporated business entity, individual, group of individuals or other entity, and whether that entity is known to Mr. Leff or NSA to be extant and/or hold any assets, and the approximate value of the entity and the interest held; and it is further

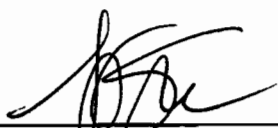
ORDERED that, pursuant to Fed. R. Civ. P. 64 and C.P.L.R. § 6220 and the Disclosure Orders, if for any account or asset required to be disclosed by the decretal paragraphs above, Defendants Steven M. Leff or NSA do not possess some or all of the information required to be disclosed by the decretal paragraphs above, Defendants Steven M. Leff and NSA must on or before 4:00 p.m. on October 4, 2007 provide counsel to Plaintiff any information they have concerning the identities, locations and contact information of persons who may possess such required information, and must grant to those persons in writing the authority to disclose such

information to Plaintiff and to the Court, and must deliver by fax, e-mail or personal delivery a copy of such authorization to Plaintiff's counsel by 4:00 p.m. on October 4, 2007; and it is further

 ORDERED that Defendants' failure to comply with the above orders by 4:00 p.m. on October 4, 2007 ^{May} ~~shall~~ result in the issuance of an order of civil contempt by this Court at 4:30 p.m. on October 9, 2007 against Steven M. Leff and NSA, and an order for the immediate arrest and imprisonment of Steven M. Leff; and it is further

ORDERED that Defendant Steven M. Leff shall submit to deposition by Plaintiff AAMG's counsel at 10:00 a.m. on October 10, 2007 at the offices of Cahill Gordon & Reindel LLP, 80 Pine Street, New York, New York.

Dated: New York, New York
September 28, 2007



United States District Judge